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NASHVILLE, TENNESSEE 37219-2386
(615) 259-1450 • FAX: (615) 259-1470
www.stokesbartholomew.com

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2003 OCT -1 PM 3:41
T.R.A. DOCKET ROOM

GUILFORD F. THORNTON, JR.
GTHORNTON@STOKESBARTHOLOMEW.COM

DIRECT DIAL: (615) 259-1492
DIRECT FAX: (615) 687-1507

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code. Ann. § 65-21-114

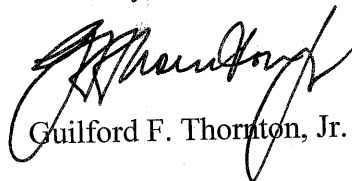
Docket No. 03-00502

Dear Director Jones:

On behalf of Citizens Telecommunications Company of Tennessee, LLC, I am enclosing with this letter responses to the inquiries contained in your Notice of Filing dated September 16, 2003 in the above referenced matter.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,


Guilford F. Thornton, Jr.

GFT/lb

cc: Mike Swatts
Gregg Sayre

- 1) Describe the manner in which you are able to provide telecommunications service in compliance with § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Citizens (Citizens Telecommunications Company of Tennessee and Citizens Telecommunications of the Volunteer State) is able to comply with § 65-21-114(a) through its active participation in the Tax Accounting Revenue (TAR) database. This database, maintained by BellSouth, houses the TAR codes for the various counties in TN. Citizens has identified the physical location of each customer it serves and has inputted the corresponding TAR code for each customer in the TAR database and in its customer record. When a Citizens' customer in TN places an intrastate toll call by dialing 1+ the telephone number, an automatic query of the calling number and called number is performed. If the TAR code is the same for the originating and terminating numbers, the call is automatically zero-rated and consequently the calling party is not billed for the call. Citizens' participation in the TAR database allows it to comply with the above referenced statute to the extent possible.

- 2) Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann § 65-21-114(a).

If the called party is served by a local service provider not participating in the TAR database, then Citizens' calling party will be billed toll charges for an intracounty call. This occurs because absent the active participation in the TAR database by all local service providers, validation of intracounty calls cannot occur. Consequently, the customer calls their local telephone service provider (Citizens) irate because they are being billed for an intracounty call. Although we attempt to explain the problem to our customers they still view the problem as ours. Unfortunately, Citizens has no way of correcting this problem going forward so the customer must call us every month requesting that their intracounty calls be credited. This is why it is essential that all providers of local telephone service participate in the TAR database.

- 3) Provide a suggestion for how this workshop should proceed.

The reason for non-compliance by some parties is very evident – not all local service providers are participating in the TAR database. This survey should help the TRA identify those parties and also identify the reason for non-compliance whether it be technical limitations or otherwise. Once the reasons for non-compliance are identified then a workshop could be convened to try to work through industry solutions to the problems.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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October 1, 2003

T.R.A. DOCKET ROOM

IN RE: Workshop to Gather Information from)
the Telecommunications Industry Related to) Docket No. 03-00502
Preventing Violations of Tenn. Code Ann. §65-)
21-114)

AT&T'S RESPONSE TO THE AUTHORITY'S DATA REQUEST

AT&T of the South Central States, LLC. ("AT&T") hereby submits the following responses to the Authority's data request issued in the above-captioned proceeding.

Question 1: Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a). If you do not currently take steps to ensure compliance with 65-21-114(a), explain your reason for not doing so.

Response: AT&T is in compliance with the toll-free county-wide calling requirement of Tenn. Code Ann. 65-21-114(a). To comply with the statute's mandate that any long distance telephone call between two points in the same county cannot be billed to the customer, it is necessary to identify the county in which both the calling party and called party are located. The identification method used by the incumbent local exchange companies ("ILECs") for this purpose is the Tax Area Rate ("TAR") code database. The TAR is a line-level file that assigns a 3-digit code for each applicable county. As the local carrier for customers, the ILECs maintain this database and update it to reflect customer changes. BellSouth acts as a consolidator, with other ILECs sending their TAR files to be compiled with those of BellSouth, which then sends the TAR files to carriers.

AT&T receives TAR files twice a month from BellSouth, on or before the 15th and 29th of the month. Upon receipt, AT&T's Message Processing Development team processes the file and uses it in conjunction with a pre-defined rating process to establish zero-rating criteria for each call that originates and terminates within the same county, as defined on the TAR file. These calls are then removed from processing in the billing systems, both those of AT&T and ILECs who bill on AT&T's behalf. Thus, the TAR files allow identification of intra-county calls so that they will not be billed to the customer.

Question 2: Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

Response: AT&T's most pressing challenge in complying with this statute is the accuracy of the information in the TAR files supplied by the ILECs. A number of ILECs do not follow a uniform, consistent practice in terms of when and how their TAR files are updated. It is not unusual for the updates to be made sporadically, and there is no uniformity for sending updates to BellSouth. As a result, the TAR files can contain inaccurate information, without updates being made in the month in which the change occurred.

Question 3: Provide a suggestion for how this workshop should proceed.

Response: A goal of the workshop should be to improve the accuracy and timeliness of the ILEC TAR files. Participants should be directed to send representatives who are knowledgeable and can make decisions to resolve the following issues:

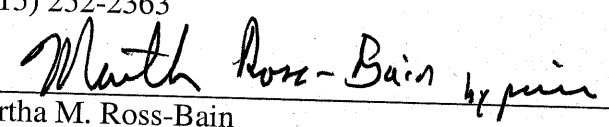
- Develop uniform standards/requirements for the TAR file content. Each ILEC should provide the same level of information and use the same qualifying criteria for TAR assignment
- Develop uniform standards/requirements for timely transmission of TAR updates from the ILEC to BellSouth
- Develop uniform standards/requirements for timely TAR dissemination from BellSouth to interexchange carriers
- Establish governance criteria and determine the appropriate monitoring tools to ensure compliance with the standards/requirements adopted

In addition, AT&T has filed a Request to Include Additional Issue in Workshop. The grounds for that Request are set forth more fully therein, but the gist is that contrary to the current practice in the industry, the new tariffs filed by Citizens Telecommunications Company of the Volunteer State and by Citizens Telecommunications Company of Tennessee (collectively, "Citizens") state that Citizens will not exchange local traffic with any competitive local exchange company ("CLEC") until after Citizens and the CLEC have entered into an "interconnection agreement or traffic exchange agreement" and after "proper facilities are in place" for the exchange of traffic. AT&T takes issue with that position and notes that the revised tariffs raise significant issues which could result in the disruption of local traffic between Citizens and CLECs. The same problems will also arise if other ILECs follow the lead of Citizens. AT&T believes the workshop will provide a convenient opportunity to address the impact of interconnection language raised in the revised tariffs as well as a general discussion of the terms and conditions upon which local traffic is exchanged between CLECs and ILECs. A workshop will allow all interested carriers to discuss these matters in an informal setting and, perhaps, avoid both service interruptions and the formal proceedings such interruptions often provide.

Respectfully submitted,
BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

Henry Walker
414 Union Street, Suite 1600
Nashville, Tennessee 37219
(615) 252-2363


Martha M. Ross-Bain
AT&T Communications of the South Central States, LLC
1200 Peachtree St., NE, Suite 8062
Atlanta, Georgia 30309
(404) 810-6713

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

October 1, 2003

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T.R.A. DOCKET ROOM

IN RE: Workshop to Gather Information from)
the Telecommunications Industry Related to) Docket No. 03-00502
Preventing Violations of Tenn. Code Ann. § 65-)
21-114)

RESPONSE OF XO TO HEARING OFFICER'S REQUEST FOR INFORMATION

XO Tennessee, Inc. ("XO") submits the following response to the Hearing Officer's request for information about implementation of T.C.A. § 65-21-114(a), the county-wide calling requirement.

XO is unaware of any current problems involving the application and implementation of county-wide calling for XO's customers in Tennessee. XO submits to BellSouth's TAR Code database the necessary information for other carriers to identify intra-county calls made to XO's customers. XO subscribes to that database information as well. With this information, all subscribing carriers can insure that the calls are properly routed and billed.

At this time, XO is unaware of any technical, operational, or administrative difficulties with this process.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

October 1, 2003

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T.R.A. DOCKET ROOM

IN RE: Workshop to Gather Information from)
the Telecommunications Industry Related to) Docket No. 03-00502
Preventing Violations of Tenn. Code Ann. § 65-)
21-114)

RESPONSE OF AENEAS TO HEARING OFFICER'S REQUEST FOR INFORMATION

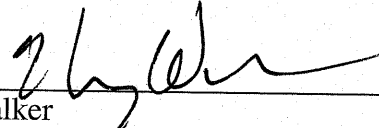
Aeneas Communications, Inc. ("Aeneas") submits the following response to the Hearing Officer's request for information about the implementation of T.C.A. § 65-21-114(a), the county-wide calling requirement.

To insure that intra-county calls to customers of Aeneas are properly identified and billed as local calls, Aeneas files the appropriate information with BellSouth's TAR Code database. In most cases, that is sufficient to insure that other carriers will comply with the county-wide calling requirement. Aeneas, however, is currently having a problem regarding county-wide calling with Century Telephone. As explained in the attached letter, Century Telephone is presently billing some intra-county calls made by Century's customers to customers of Aeneas as long distance calls. Aeneas has complained to Century about this apparent violation of state and federal law but Aeneas has not yet received a response. In Aeneas' opinion, Century's actions are inconsistent with T.C.A. § 65-21-114(a) and with federal law. Aeneas suggests that these issues should be addressed at the industry workshop.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____



Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363



BOULT • CUMMINGS
CONNERS • BERRY PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@boultcummings.com

July 31, 2003

Ms. Susan W. Smith
CenturyTel
Director External Affairs
911 N. Bishop Rd., 0207
Texarkana, TX 75501

Dear Ms. Smith:

I am writing on behalf of Aeneas Communications, Inc. concerning the exchange of local traffic between CenturyTel and Aeneas in Tennessee.

As you may know, Tennessee law mandates that intra-county telephone calls be billed as local calls. See T.C.A. 65-21-114.¹ This occasionally creates legal and operational issues in counties where there are more than one incumbent local carriers and a competing local exchange carrier operates in the service area of one ILEC but not the other.

Aeneas operates as a CLEC in the service area of BellSouth and, in some areas, exchanges intra-county traffic with CenturyTel. When an intra-county call is made by a CenturyTel customer to an Aeneas customer, the originating caller dials 1 + area code + seven digits. The call is then routed to the caller's presubscribed intra-LATA toll carrier. The toll carrier uses the Tax and Revenue Code (TAR Code) to compare the originating and terminating numbers and identify intra-county traffic. As required by the statute, such calls are classified as toll free and not billed to any customer.

According to Mr. Jonathan Harlan, President of Aeneas, some intra-county calls from CenturyTel customers to Aeneas customers are not being billed as local calls but as toll calls. He has told me that CenturyTel bills the customer for a toll call if (a) CenturyTel is the customer's intra-LATA toll carrier and (b) the call terminates at an ISP served by Aeneas. It is his understanding that CenturyTel believes that a dial-up Internet call should not be treated as a local call, even though the terminating number is identified by the TAR Code as being in the same county as the number of the originating caller. This situation apparently only arises when the CenturyTel is the caller's presubscribed intra-LATA toll carrier. Other intra-LATA carriers rate the call as a local call for billing purposes as described above.

CenturyTel's treatment of these intra-county calls as toll calls is not consistent with the rulings of the FCC. Although the FCC considers such calls "interstate" for jurisdictional

¹ The law states, "Any telephone call made between two points in the same county in Tennessee shall be classified as toll-free and shall not be billed to any customer."

Ms. Susan W. Smith
July 31, 2003
Page 2

purposes, the FCC has also declared that such calls are "local" for billing purposes. Starpower Communications v. FCC, No. 02-1131, (D.C. Circuit), memorandum opinion issued July 18, 2003, p.9.

As the FCC has explained,

ISPs, one class of enhanced service providers (ESPs), also may utilize LEC services to provide their customers with access to the Internet. In the MTS/WATS Market Structure Order, the Commission acknowledged that ESPs were among a variety of users of LEC interstate access services. Since 1983, however, the Commission has exempted ESPs from the payment of certain interstate access charges. Consequently ESPs, including ISPs, are treated as end-users for the purpose of applying access charges and are, therefore, entitled to pay local business rates for their connections to LEC central offices and the public switched telephone network (PSTN). Thus, despite the Commission's understanding that ISPs use interstate access services, pursuant to the ESP exemption, the Commission has permitted ISPs to take service under local tariffs.

"Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Inter-Carrier Compensation for ISP-Bound Traffic," Order on Remand and Report and Order, 16 FCC Red. 9151, paragraph 45 (2001), emphasis added.

In an earlier order, the FCC said similarly, "Thus, although recognizing that it was interstate access, the Commission has treated ISP-bound traffic as if it were local. "In the Matter of Inter-Carrier Compensation for ISP-Bound Traffic", CC Docket 99-68, released February 26, 1999, paragraph 23.

Thus, an ISP served by Aeneas is entitled to take service under Aeneas' local tariffs and calls to the ISP from within the local calling area are treated as local, not toll, calls for billing purposes.² The FCC's rulings in this area are quite clear.


Therefore, Aeneas asks that CenturyTel reconsider its position on this issue in light of the Tennessee county-wide calling requirement and the FCC's decisions. Please call me, or ask your attorney to call me, if you have any questions or if I have misunderstood either the factual circumstances or CenturyTel's position. I would appreciate a quick response to this letter so that Aeneas can decide how next to proceed.

² If CenturyTel believes that every call to an ISP should be treated as a toll call, then CenturyTel should similarly charge its own customers for a toll call each time the customer dials up CenturyTel's ISP service. Presumably CenturyTel is treating such calls as local traffic and must, therefore, treat intra-county calls to an ISP served by Aeneas in the same manner.

Ms. Susan W. Smith
July 31, 2003
Page 3

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/pp

Cc: Mr. Jonathan Harlan
Mr. David Dickey, Sr.



BOULT • CUMMINGS
CONNERS • BERRY, PLC

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Jon E. Hastings
(615) 252-2306
Fax: (615) 252-6306
Email: jhastings@boultcummings.com

T.R.A. DOCKET ROOM

October 1, 2003

Hon. Chairman Deborah Tate
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Workshop to Gather Information from the Telecommunications Industry Related
To Preventing Violations of Tenn. Code Ann. § 654-21-114
Docket No. 03-00502

Dear Chairman Tate:

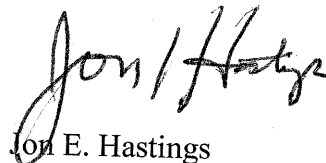
Enclosed please find the original plus fourteen (14) copies of MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc., MCI WorldCom Communications, Inc., MCI WorldCom Network Services, Inc., SouthernNet, Inc. d/b/a Telecom*USA and TTI National, Inc.'s Response to Inquiries in the Notice of Filing dated September 16, 2003 in the above-referenced docket.

Thank you for your assistance in this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Jon E. Hastings

JEH/th

Enclosures

cc: Ken Woods, Esq.

RESPONSE OF MCI TO NOTICE OF FILING

Comes now MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc., MCI WorldCom Communications, Inc., MCI WorldCom Network Services, Inc., SouthernNet, Inc. d/b/a Telecom*USA, and TTI National, Inc., collectively referred to as "MCI," and respond to the Notice of Filing dated September 16, 2003 issued by the Tennessee Regulatory Authority ("Authority"). MCI consists of both competitive local exchange carriers ("CLECs") and interexchange carriers ("IXCs"), and, in particular, as is most prominently identified with its products known as the Neighborhood built by MCI®, provides bundled competitive local and long distance products to residential mass market customers.

MCI, like other carriers that provide interexchange services, uses billing systems based on originating and terminating telephone numbers to determine jurisdiction and rate. County-wide calling requirements do not fit into this standard billing convention and require considerable investment of time and money to exclude calls that should otherwise be billed. IXCs thus not only provide service without payment, but also must pay extra to change their billing systems to ensure that customers are not billed for countywide calls and that local exchange carriers reimburse IXCs for access charges it should not have billed in the first place. Moreover, competition has eliminated the need for mandated countywide calling; in today's market, with full-service wireline products such as the Neighborhood®, and BellSouth Telecommunications, Inc.'s ("BellSouth's") Unlimited Answers, as well as wireless offerings, mandated countywide calling is a vestige of past regulatory law and policies.

Notwithstanding these concerns, MCI provides telecommunications service in compliance with Tenn. Code Ann. § 65-21-114 (a). To implement countywide calling, MCI obtains data feeds - TAR codes - from an administrator (in this instance, BellSouth) that provides data related to the affected end-user's NPA-NXXs, the county within which he or she resides, and whether the calls are intra or inter-county. Using those feeds, MCI updates its numbering and billing databases appropriately. Accordingly, although no database or system of data exchange is free from error, there have been few instances of billing errors affecting MCI customers in the past several years involving countywide calling in Tennessee.

What issues occurred in the past typically involved numbering changes. For example, if a new area code was implemented, a revised list of TAR codes based on the new NPA/NXX combinations would need to be distributed by the administrator of the TAR database. In these instances, stale-dated TAR data from local exchange carriers could create errors. Also, during permissive dialing periods it became necessary to update IXC systems to accommodate both old *and* new TAR code data. There was an instance in 2001 when MCI identified the need to update its system to accommodate permissive dialing. That need was successfully addressed by MCI. Although no specific technical or systemic issues regarding numbering changes have been recently identified by MCI, it is possible that future numbering changes or in numbering administration could create countywide calling issues. As is the case today, if any billing errors would occur, customer service appropriately credited the affected end-user's account.

MCI appreciates the opportunity to respond to the Authority's requests in its Notice of Filing. If any technical or systemic issues emerge in this docket, MCI suggests

that IXCs convene an industry group to meet with incumbent local exchange carriers ("ILECs") and CLECs, as well as BellSouth in its role as administrator, and propose necessary changes.

R. DALE GRIMES
TEL: (615) 742-6244
FAX: (615) 742-2744
dgrimes@bassberry.com

BASS, BERRY & SIMS, P.L.C.
A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

AMSOUTH CENTER
315 DEADERICK STREET, SUITE 2700
NASHVILLE, TN 37238-3001
(615) 742-6200

www.bassberry.com

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T.R.A. DOCKET ROOM

October 1, 2003

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114,
Docket No. 03-00502***

Dear Chairman Tate:

Enclosed for filing in the above-styled matter are the original and thirteen copies of Millington Telephone Company's response to Director Jones' request for information in the above-referenced docket. Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Very truly yours



R. Dale Grimes

RDG/ts
Enclosures

cc: Mr. David Espinoza

Millington Telephone Company
Response to Docket 03-00502

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a).

Response: Millington Telephone Company customers located in Shelby, Fayette, and Tipton Counties receive county-wide calling throughout those three counties through the Memphis Metro Area Calling Plan. Customers located in Millington's serving area in Haywood County, the Stanton exchange, receive county-wide calling through Millington's trunk arrangements with BellSouth in Brownsville, Tennessee, using the TAR database.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

Response: Millington Telephone Company is not aware of any such difficulties with respect to its customers.

3. Provide a suggestion for how this workshop should proceed.

Response: Millington submits that the workshop needs to be inclusive of all carriers.



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STACEY A. KLINZMAN

T.R.A. DOCKET ROOM

7901 SKANSIE AVENUE,

SUITE 240

GIG HARBOR, WA 98335

TELEPHONE: 253.851.6700

FACSIMILE: 253.851.6474

HTTP://WWW.MILLERISAR.COM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: CIMCO Communications, Inc. ("CIMCO") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

CIMCO Communications, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: CIMCO is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, CIMCO does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. CIMCO's underlying carriers, Global Crossing, AT&T and Qwest, do not provide CIMCO with CARE records that distinguish intracounty calls from other instate calls.
3. To CIMCO's knowledge, CIMCO's underlying carriers charge CIMCO for all calls carried over its network, including intracounty calls.

STACEY A. KLINZMAN

**MILLER
ISAR** INC.
REGULATORY CONSULTANTS

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T.R.A. DOCKET ROOM

7901 SKANSIE AVENUE,
SUITE 240

GIG HARBOR, WA 98335

TELEPHONE: 253.851.6700

FACSIMILE: 253.851.6474

HTTP://WWW.MILLERISAR.COM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: CIMCO Communications, Inc. ("CIMCO") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

CIMCO Communications, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: CIMCO is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, CIMCO does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. CIMCO's underlying carriers, Global Crossing, AT&T and Qwest, do not provide CIMCO with CARE records that distinguish intracounty calls from other instate calls.
3. To CIMCO's knowledge, CIMCO's underlying carriers charge CIMCO for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

4. CIMCO has not received any complaints from customers regarding intracounty call charges on bills and, therefore, is not aware of whether the underlying carriers are passing through intracounty calls to CIMCO.
- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

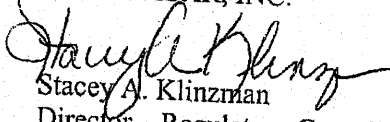
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: CIMCO has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.


Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
CIMCO Communications, Inc.

cc: Thad Goretski, Treasury Services Manager, CIMCO Communications, Inc.

From: "Sered, David" <David_Sered@cable.comcast.com>
To: "Julie.Woodruff@state.tn.us" <Julie.Woodruff@state.tn.us>
Date: 10/1/03 3:27PM
Subject: Re: Docket No. 03-00502 - Input for Compliance with TN Code Ann. 65-21-114

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2003 OCT -1 PM 4: 04
T.R.A. DOCKET ROOM

Ms. Woodruff:

Per our conversation today - here are Comcast Business Communications, Inc.'s ("CBC") responses to the request by the TRA for input:

- 1) CBC is a Switchless IXC Reseller only in Tennessee.
- 2) CBC has less than 25 customers (all being business customers). CBC has no residential customers in Tennessee.
- 3) CBC's customers are mostly satellite offices of customers in other states and are under individual customer arrangements.
- 4) CBC does not have any technical, operational or administrative or other difficulties encountered when attempting to comply with specific statute being addressed by the commission. CBC's traffic is sent from one lata to another.
- 5) CBC has no further comments as to how this workshop should proceed.

Please let me know if you have additional questions.

Thanks,

Dave Sered
Director of Regulatory Affairs/Telephony
Southern Division
Comcast Cable Communications
678-460-1610
678-385-5101 (fax)
david_sered@cable.comcast.com



IDS TELCOM Headquarters 1525 N.W. 167th Street, Suite 200, Miami, Florida 33169 U.S.A.
T+ 305 913 4000 F+ 305 913 4024 TOLL FREE+ 800 335 4437

October 1, 2003

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2003 OCT -1 PM 4:04

T.R.A. DOCKET ROOM

Via Facsimile

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**Re: Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. §65-21-114**

Dear Mr. Jones,

IDS is in receipt of this Commission's letter dated 9/16/03 requesting telecommunication service providers to give input on preventing violations of Tenn. Code Ann. §65-21-114(a).

IDS is able to provide telecommunications service in compliance with Tenn. Code Ann. §65-21-114(a) pursuant to its BellSouth Interconnection Unbundling and Resell Agreement filed with this Commission. IDS defines its local calling area the same as the incumbent, BellSouth. Calls within the local calling area established by BellSouth are not billed.

IDS has not encountered any technical, operational, or administrative difficulties when complying with the Tenn. Code Ann. §65-21-114(a).

Should you have any questions, please do not hesitate to contact me at (305) 612-4226.

Sincerely,

Awilda Santiago
Regulatory Affairs
IDS Telcom, LLC

Enclosure

FARRIS MATHEWS BRANAN
BOBANGO & HELLEN, PLC

ATTORNEYS AT LAW

RECEIVED

2003 OCT -1 PM 4:08

HISTORIC CASTNER-KNOTT BUILDING
618 CHURCH STREET, SUITE 300
NASHVILLE, TENNESSEE 37219

T.R.A. DOCKET ROOM

Charles B. Welch, Jr.
cwelch@farrismathews.com

Telephone: (615) 726-1200
Facsimile: (615) 726-1776

Writers Direct Dial:
615-687-4230

October 1, 2003

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: Time Warner Telecom of the MidSouth, LLC's ("TWTC") Data Response to Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of T.C.A. §65-21-114

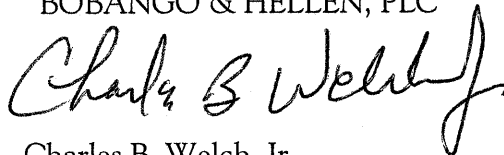
Dear Director Jones:

In response to the Notice of Filing of September 16, 2003, please find attached an original and 14 copies of the data response in regard to the above referenced matter. Please date stamp a copy for our records.

Thank you for your assistance regarding this matter. If you have any questions or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO & HELLEN, PLC



Charles B. Welch, Jr.

CBW/cad

Enclosure

TWTC Data Response

RE: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of T.C.A. §65-21-114

1. Describe the manner in which you are able to provide telecommunications service in compliance with T.C.A. §65-21-114(a). If you do not currently take steps to ensure compliance with §65-21-114(a), explain your reason for not doing so.

Answer: TWTC only serves exchanges located in Shelby County and offers customers in these exchanges a local calling plan (toll-free calling) throughout all of Shelby, Tipton and Fayette counties and a portion of Hardeman County.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with T.C.A. §65-21-114(a).

Answer: None.

3. Provide a suggestion for how this workshop should proceed.

Answer: (a) Identify all violations of T.C.A. §65-21-114(a); (b) Identify the reasons for such violations; and (c) design a cost efficient solution.



VALUE-ADDED

COMMUNICATIONS

RECEIVED

2003 OCT -1 PM 3:18

T.R.A. DOCKET ROOM

1601 N. Collins Blvd.

Richardson, TX 75080

Tel: 972-479-1919

Fax: 972-808-3332

September 29, 2003

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 73243-0505

RE: Docket No. 03-00502

To Whom it May Concern,

This is Value-Added Communications, Inc. (VAC) response to the Tennessee Regulatory Authority inquiry regarding Docket No. 03-00502, dated September 16, 2003.

VAC uses a third party vender to provide information as to which NPA-NXX's are local to the inmate facilities to which VAC provides service. The vender VAC uses is:

CCMI
11300 Rockville Pike
Suite 1100
Rockville, MD 20852-3030
(888) 275-2264
info@ccmi.com

VAC's third party vender, (CCMI), and/or the ILEC's/CLEC's that provide information to CCMI would know of any technical, operational, administrative, or other difficulties in complying with Tennessee Code Ann. § 65-21-114(a).

VAC has no suggestions on how the proposed workshop should proceed.

Thank you,


Cheryl Cook

Regulatory Assistant

Value-Added Communications, Inc.

(972) 808-3319

Cheryl.cook@vaci.com